

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ALLEN ROBINSON,	)	
	)	
<i>Plaintiff,</i>	)	Case No. 23 C 02724
	)	
v.	)	Hon. Judge Martha M. Pacold
	)	District Judge
WAYNE FRANO, <i>et al.</i> ,	)	
	)	Mag. Judge Heather K. McShain
<i>Defendants.</i>	)	
	)	
	)	<b>JURY TRIAL DEMANDED</b>
	)	

**JOINT STATUS REPORT**

Pursuant to this Court's Order (Dkt. 82), the parties submit the following joint status report:

**Amended Pleadings**

1. Plaintiff does not intend to file an amended complaint at this time.
2. Defendants will answer the complaint with respect to Count VIII by September 11, 2024.

**Progress of Discovery**

3. Since the parties' last status report in this case, the parties have met and conferred regarding Defendants' initial interrogatory responses.
4. The parties have conferred and come to an agreement on questioning priority of four third-party witnesses. Plaintiff has noticed the deposition of Chicago Police Officer Joanna Jaromin for September 13, 2024.

5. Defendants have approximately four outstanding subpoenas for records.

Notably, Defendants have an outstanding subpoena to Plaintiff's Post Conviction Counsel. On August 28, 2024, the Defendants were notified that the Plaintiff's Post-Conviction Counsel will comply with the subpoena request.

6. Plaintiff will file an Agreed Motion for an Order to Examine, View, and Photograph Impounded Evidence in the Circuit Court of Cook County Criminal Division on or by August 29, 2024, in order to inspect the impounded evidence from Plaintiff's criminal case which is relevant to this case.

### **Settlement**

7. There are no current settlement discussions in this case.

Dated: August 29, 2024

RESPECTFULLY SUBMITTED,

/s/ Annie Prossnitz  
*Counsel for Plaintiff*

Jon Loevy  
Scott Rauscher  
Annie Prossnitz  
LOEVY & LOEVY  
311 N. Aberdeen  
Chicago, Illinois 60607  
(312) 243-5900  
[prossnitz@loevy.com](mailto:prossnitz@loevy.com)

/s/ Misha Itchhaporia  
*Special Assistant Corporation Counsel*

Steven B. Borkan  
Timothy P. Scahill  
Misha Itchhaporia  
Emily E. Schnidt

Borkan & Scahill, Ltd.  
20 S. Clark St., Suite 1700  
Chicago, IL 60603  
(312) 580-1030  
*Counsel for Defendants Frano, Celio, Brasic,  
McDermott, Folino, Conroy, Zelig & Babich*

/s/ Daniel M. Noland  
*Special Assistant Corporation Counsel*

Terrence M. Burns  
Paul A. Michalik  
Daniel M. Noland  
Elizabeth A. Ekl  
Katherine C. Morrison  
Daniel J. Burns  
Dhaviella N. Harris  
Reiter Burns LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
*Attorneys for Defendant City of Chicago*

**CERTIFICATE OF SERVICE**

I, Annie Prossnitz, an attorney, certify that on August 29, 2024, I filed the foregoing JOINT STATUS REPORT using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Annie Prossnitz  
*One of Plaintiff's Attorneys*